

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

V.

JOSE CARLOS GRUBISICH,

Defendant.

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X

No. 19 Cr. 102 (RJD)

**NOTICE OF MOTIONS TO DISMISS THE INDICTMENT AND TO COMPEL  
PRODUCTION OF A BILL OF PARTICULARS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Defendant Mr. Jose Carlos Grubisich will move this Court, before the Honorable Raymond J. Dearie, United States District Judge, at the Theodore Roosevelt United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, for an Order dismissing the Indictment and compelling the government to file a bill of particulars. Oral argument will be held on a date and at a time to be designated by the Court.

Dated: June 22, 2020  
New York, New York

Respectfully submitted,

By: /s/ Edward Y. Kim

**KRIEGER KIM & LEWIN LLP**  
500 Fifth Avenue, 34th Floor  
New York, New York 10110  
Tel.: (212) 390-9550  
Edward.Kim@KKLlp.com  
Henry.Ross@KKLlp.com

BRACEWELL LLP  
1251 Avenue of the Americas, 49th Floor  
New York, New York 10020  
Tel.: (212) 508-6100  
Paul.Shechtman@Bracewell.com

*Attorneys for Jose Carlos Grubisich*